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September 12, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

**RE: *Joint Petition of Price Cap Holding Companies for Conversion of
Average Schedule Affiliates to Price Cap Regulation and Limited Waiver Relief,*
WC Dkt. No. 12-63**

Dear Ms. Dortch:

On September 10th, Joel Lubin, David Hostetter, Saikat Sen, Christi Shewman and the undersigned representing AT&T Services Inc. met with Victoria Goldberg, Pam Arluk and Doug Slotten of the Pricing Policy Division of the Wireline Competition Bureau to discuss the above referenced proceeding. The purpose of the meeting was to discuss the precedential nature of the first carriers leaving the NECA pool and converting to price cap regulation as the Commission implements the new intercarrier compensation regime. AT&T supports the conversion to price cap and commended these companies for not utilizing the methodology they originally proposed in their price cap waiver petitions. AT&T urged the Commission to ensure that requests to exit the pool are transparent on both the part of the companies exiting the pool as well as NECA and emphasized the need to collectively examine these filings for their overall impacts on exchange access prices and CAF ICC support.

Please call me if you have any questions.

Sincerely,

/s/ Brian J. Benison

cc: Victoria Goldberg
Pam Arluk
Doug Slotten